



Mental Health & Money Advice

Response from Mental Health & Money Advice (part of Mental Health UK) to Ofgem's consultation on its Draft Consumer Vulnerability Strategy 2025

About Mental Health & Money Advice and Mental Health UK

Mental Health & Money Advice is the first UK-wide service to tackle the issues of mental health and money together.

It was launched in November 2017 and commissioned by the charity Mental Health UK. Mental Health UK brings together four mental health charities with over 40 years of combined experience to provide advice, information and support. Mental Health & Money Advice is delivered in each nation of the UK by Mental Health UK's founding partner charities Rethink Mental Illness (England), Support in Mind Scotland (Scotland), Hafal (Wales) and Mindwise (Northern Ireland).

In the service's first year:

- We supported 1,198 individuals through our telephone casework service.
- 207,810 users accessed our website (www.mentalhealthand-moneyadvice.org)

The telephone casework service receives referrals from Mental Health UK's founding partner charities as well as National Debtline, Stepchange, Shelter Cymru and the Money Advice Service helpline. The service is open to new referral partnerships.

Independent evaluation of the service has proven that the support provided has improved the mental wellbeing of its clients and increased their confidence around dealing with debt and money issues (see our [Year 1 Impact Report](#)).

Our interest in Ofgem's draft Strategy

Mental Health & Money Advice assists those struggling with money and mental health problems, including debt and other problems with energy providers.

We represent clients across the mental health spectrum and are keen to see this wide spectrum reflected in considerations around vulnerability. In our first year, 90% of our clients experienced mental illness (the most common diagnosis was depression, but we also helped people living with schizophrenia, bipolar disorder and PTSD). 9% of those we helped were caring for someone living with a mental illness. We are keen that carers are considered in action around vulnerability as they can be an important facilitator.

Mental Health UK, via our partner charities, is also in day to day contact with tens of thousands of people living with mental illness, and their carers. This includes through our hundreds of local groups, services and our advice lines. That means, for example,

that we are well placed to help ensure that people with mental health problems and their carers are made aware of the Priority Services Register.

Key points in response to Ofgem's draft Strategy

Vulnerability and definitions

- Mental Health & Money Advice welcomes Ofgem's retention of a broad definition of vulnerability that recognises the interaction of personal circumstances with aspects of the market.
- We suggest that the strategy, and any future good practice around vulnerability, acknowledges the wide spectrum of mental health. Mental health affects all of us, but severe mental illness affects some of us and different approaches may be needed to address these differences especially where a condition is severe and enduring.

Theme 1: Improving identification of vulnerability

- We suggest that more work is needed by Ofgem on segmenting mental health data to reflect, for example, the differences between the needs of someone with a severe mental illness and someone with a common mental health problem such as an anxiety disorder.
- We agree that practice is very patchy and more needs to be done to ensure a consistent and pro-active approach among providers and operators.
- We suggest an expansion of relevant categories within the PSR so that Ofgem and those it regulates are in a better position to monitor outcomes for those with mental health problems.

Theme 2: Supporting those struggling with their bills

- We welcome Ofgem's aim to measure supplier initiatives to support customers in payment difficulty.
- Many of our clients have wider debt and welfare issues and may require more holistic help. We suggest that Ofgem should consider how suppliers are engaging with third parties, including advice services, to ensure this holistic help.

Theme 3: Improving customer service

- We recommend that the strategy is clear that providers and operators should adopt a range of consumer engagement mechanisms that meet the needs of the consumer (and that examples and good practice highlighted by Ofgem reflect this).
- A company might infer from the current strategy, for example, that telephone contact is not advisable for those with mental health issues. One study (cited in the draft Strategy) indicates that 54% of people with mental health problems have serious difficulties using a telephone – but this means that 46% do not. There is also a distinction to be made between unplanned telephone calls being made or received in a crisis (with someone without the appropriate skills or mental health awareness training) and an ongoing telephone relationship where the client is

receiving advice and help from a well-trained adviser (for example through a service such as Mental Health & Money Advice.)

- Our experience also suggests that some people with mental health problems, who may be averse to face to face contact or leaving their home, may also prefer the telephone. This may be the case especially if they are not online. Official data is aggregated for disability (in 2017, 56% of adult internet non-users were disabled, much higher than the proportion of disabled adults in the UK population as a whole, which in 2016 to 2017 was estimated to be 22%ⁱ.) but there is evidence that people with psychosis particularly experience barriers to being onlineⁱⁱ.
- As suggested below (Theme 5) we suggest that Ofgem supports companies to reach out to appropriate third party support.

Theme 4: Encouraging positive and inclusive innovation

- We agree that Ofgem should collect evidence from energy companies around inclusive design processes and that this should include evidence of consulting with third sector and other consumer groups to capture the breadth of lived experience.

Theme 5: Working with others to solve issues that cut across multiple sectors

- We welcome Ofgem's intention to improve engagement with the third sector and other potential partners.
- We welcome increased support from Ofgem to help us understand better how to protect consumers in our advice work.
- We believe there is also a need for Ofgem to encourage those it regulates to undertake more work with the third sector. While we believe that suppliers and providers should have the capacity and understanding to address vulnerability in their business, there will be instances where expert advice – from outside the business – will secure the best outcome for the consumer. For example, some firms have referred to Mental Health & Money Advice for specialist money and mental health advice, especially where the consumer's problems are multi-faceted and involve the need for welfare advice or debt management help to resolve billing issues.

Contact details

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ⁱ Office for National Statistics (March 2018) [Exploring the Nation's Digital Divide](#)

ⁱⁱ Journal for Medical Evidence (November 2016) [Do We Still Have a Digital Divide in Mental Health? A Five-Year Survey Follow-up](#)